



STATE OF WASHINGTON  
**HEALTH CARE AUTHORITY**

626 8th Avenue, SE • P.O. Box 45502 • Olympia, Washington 98504-5502

October 3, 2016

Dear Interested Parties:

Re: Fee-for-Service Access Monitoring Review Plan

Recently the Centers for Medicare & Medicaid Services (CMS) published final rules designed to ensure that States' fee-for-service Medicaid payments comply with the access standards in Section 1902(a)(30)(A) of the Social Security Act (SSA) (80 Fed. Reg. 67,576 (Nov. 2, 2015)). These rules added significant new procedural requirements for States.

These rules require States to develop "a medical assistance access monitoring review plan" to evaluate enrollees' access to certain Medicaid services. This access monitoring review plan, and all other requirements in the new rules, applies to the Medicaid fee-for-service (FFS) program only; the rules expressly exclude from this requirement populations covered by Medicaid managed care or a federal waiver program. This plan must include an access monitoring analysis that considers:

- i. The extent to which beneficiary needs are fully met;
- ii. The availability of care through enrolled providers to beneficiaries in each geographic area, by provider type and site of service;
- iii. Changes in beneficiary utilization of covered services in each geographic area.
- iv. The characteristics of the beneficiary population (including considerations for care, service and payment variations for pediatric and adult populations and for individuals with disabilities); and
- v. Actual or estimated levels of provider payment available from other payers, including other public and private payers, by provider type and site of service.

On September 2, 2016, the Agency published a draft document and began the thirty day public comment period. Based upon comments received changes were made to the plan during this period to include additional data for various categories of services as well as dental data. The final Fee-for-Service Access Monitoring Review Plan Report as required by 42 C.F.R. § 447.203 is now available online at [\[http://hca.wa.gov/assets/program/ffs-access-report.pdf\]](http://hca.wa.gov/assets/program/ffs-access-report.pdf) This report is based on 2015 calendar year data and is being used to establish a baseline for future monitoring review plans which Washington will submit to CMS for ongoing regulatory compliance.

Compiling data specific to the FFS population has proven challenging. We have attempted to comply with the spirit of the regulation by providing as many responsive data elements as we currently have available. We are undertaking significant enhancements in our capacity to improve our data gathering, analytics, and management processes in order to provide a more responsive and robust medical assistance monitoring review plan. This will enable the Agency to support meaningful policy discussions

surrounding the Washington Apple Health FFS program, and will update our report when that information is available.

Sincerely,

Preston W. Cody  
Division Director, Medicaid Program Operations and Integrity.

cc: Taylor Linke, Deputy Assistant Director, MPOI, HCA  
Jessie Dean, Tribal Affairs Administrator, PPP, HCA